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6 7	Attorneys for Plaintiff United States of America	
8	IN THE UNITED STATES DISTRICT COURT	
9   10	EASTERN DISTRICT OF CALIFORNIA	
11	UNITED STATES OF AMERICA,	CASE NO. 2:25-cr-00054-JAM
12	Plaintiff,	FIRST STIPULATION AND ORDER TO
13	v.	CONTINUE STATUS CONFERENCE AND EXCLUDE TIME
14	TAEZON LAURECE SANDERSON,	DATE: April 8, 2025
15	Defendant.	TIME: 9:00 a.m. COURT: Hon. John A. Mendez
16		
17	STIPULATION	
18	Plaintiff United States of America, by and through its counsel of record, and defendant, by and	
19	through defendant's counsel of record, hereby stipulate as follows:	
20	1. By previous order, this matter was set for status on April 8, 2025.	
21	2. By this stipulation, defendant now moves to continue the status conference until May 6,	
22	2025, and to exclude time between April 8, 2025, and May 6, 2025, under Local Code T4.	
23	3. The parties agree and stipulate, and request that the Court find the following:	
24	a) The government has represented that the discovery associated with this case	
25	includes multiple extracted cell phones and video surveillance footage, totaling multiple	
26	gigabytes of data. Discovery also includes hundreds of pages of reports and photos. All of this	
27	discovery has been either produced directly to counsel and/or made available for inspection and	
28	copying.	

- b) Counsel for defendant desires additional time to review this voluminous discovery and discuss the charge with his client.
- c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
  - d) The government does not object to the continuance.
- e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 8, 2025 to May 6, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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IT IS SO STIPULATED. Dated: March 28, 2025 MICHELE BECKWITH Acting United States Attorney /s/ J. DOUGLAS HARMAN J. DOUGLAS HARMAN Assistant United States Attorney /s/ MICHAEL LONG Dated: March 28, 2025 MICHAEL LONG Counsel for Defendant TAEZON LAURECE **SANDERSON** 

**ORDER** IT IS SO ORDERED. Dated: March 31, 2025 /s/ John A. Mendez THE HONORABLE JOHN A. MENDEZ SENIOR UNITED STATES DISTRICT JUDGE